

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

RAYMOND A. CARRUTHERS,

Plaintiff,

v.

**KIMBERLY COLTON, individually;
CHARLES HUMPHREYVILLE;
individually; KRISTINE WESTON
individually;**

Defendants.

**NOTICE OF
MOTION**

**Civil Action Number:
6:20-cv-399 (FJS/TWD)**

JUDGE SCULLIN

PLAINTIFF'S MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the attached Affidavit of Zachary C. Oren, all exhibits attached thereto, and the accompanying Memorandum of Law, Plaintiff Raymond A. Carruthers, will move the Court **on submission**, at a stated motion term in the United States Court House for the Northern District of New York at the James Hanley Federal Building, located at 100 South Clinton Street, Syracuse, New York, 13261, for an order pursuant to Rule 15 (a) (2) of the Federal Rules of Civil Procedure granting leave to file Plaintiff's proposed Amended Complaint and for such other and further relief as the Court deems appropriate.

Respectfully submitted,

Dated: December 19, 2021

/s/ Zachary C. Oren
Zachary C. Oren, Esq.
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To: Jonathan Reiner, Esq. (*via CM/ECF filing*)
Assistant Attorney General
Attorney for Defendant